

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

v.

JEREMY J. RYAN,

Case No.: 18-cr-152-jdp

Defendant.

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MOTION FOR ENTRY OF  
PROTECTIVE ORDER GOVERNING DISCOVERY

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Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by Scott C. Blader, United States Attorney for the Western District of Wisconsin, by Elizabeth Altman, an Assistant United States Attorney for said district, moves for the entry of a protective order, and in support thereof states as follows:

1. The indictment in this case charged the defendant in count 1 with knowingly and unlawfully attempting to possess radioactive material with the intent to cause death or serious bodily injury in violation of Title 18, United States Code, Section 2332i(a)(1) and (3) and in count 2 with unlawfully intentionally attempting to receive and possess nuclear or nuclear byproduct material, in violation of Title 18 United States Code, Section 831(a)(1)(B) and (a)(8). The defendant pleaded guilty to count 2 and was sentenced to time served.

2. The discovery provided by the government in this case included sensitive information, the unrestricted dissemination of which could adversely affect law enforcement interests and the privacy interests of third parties.

3. The defendant has already posted portions of an interview with law enforcement online.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Dated this 19<sup>th</sup> day of March 2020.

Respectfully submitted,

SCOTT C. BLADER  
United States Attorney

By: /s/  
Elizabeth Altman  
Assistant United States Attorney